107-100



Solutia Inc.

575 Maryville Centre Drive St. Louis, Missouri 63141

P.O. Box 66760 St. Louis, Missouri 63166-6760 *Tel* 314-674-1000

November 10, 2000

Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)

• November 2000 Monthly Report

Dear Mr. McAteer,

Enclosed is the November 2000 Monthly Report for Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

D. M. Light

Manager, Remedial Projects

Solutia Inc.

cc: T. Gouger - USACE

C. Morin - IEPA

Sauget File - Solutia

Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)

Kevin de la Bruere - USF&W

Michael L. Henry - IDNR

Tom Long - Cahokia Consultant (% Sapphire Group)

Dave Webb - IDPH

Mayor J. Livigni - Cahokia, IL

Mayor P. Sauget - Sauget, IL

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Monthly Report

Date of Report:

November 10, 2000

Period Covered:

October 1, 2000 - October 31, 2000

Next Report Period:

November 1, 2000 - November 30, 2000

Work Performed during the reporting period

All required field work for the Sauget Area 1 Support Sampling Plan ("SSP") was completed prior to this report period. During the month of October, the Sauget Area I Project Team continued to focus on data interpretation and initial preparation of the Data Report and Risk Assessments.

There are no Technical Memos attached to this report.

Data Submittal

1. There is no data submitted in this report. All project data has been submitted in previous monthly reports.

Work scheduled for next reporting period

The Work during November will continue to focus on interpretation of the data and preparation of the Risk Assessments.

The next AOC required submittal is the Data Report, due January 9, 2001. It is our intent to submit the Human Health Risk Assessment and the Ecological Risk Assessment by January 9, 2001 also.

Future AOC required submittals include:

- EE/CA Report March 9, 2001
- RI/FS Report April 9, 2001

Problems and Solutions

NONE

Submittal Schedule Status
See attached schedule - consistent with the approved SSP - as revised where indicated.
Issues under review
NONE
Comments:
NONE

January 21, 1999 Sauget Area I AOC SCHEDULE

(11/99 Revision)

1. Designation of Contractor Completed 3/10/99¹

2. Designation of Other Contractors 5 Business Days Before Start

of Work

3. Designation of Project Coordinator Completed

4. Submit Support Sampling Plan (SSP) Submitted February 22, 1999

5. Submit Revised SSP April 8, 1999²

June 25, 1999³ August 13, 1999⁴

October 9, 1999⁵ Approval

6. Obtain Access Agreements July 1, 1999⁶

October 17, 1999⁷ October 1, 1999⁸

7. Submit Health and Safety Plan (HASP) Approved October 9, 1999

8. Submit Quality Assurance and Approved October 9, 1999

Sampling Plan (QAPP)

¹ Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

² Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

³ April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25th as required.

⁴ June 25th SSP submittal disapproved July 16, 1999 and resubmitted August 13, 1999.

⁵ August 13, 1999 SSP submittal as revised August 30, 1999 and October 7, 1999 received final Agency approval on October 9, 1999.

⁶ Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

⁷ Access agreements update issued August 15, 1999 with request to extend deadline to October 17, 1999. Extensions to October 17, 1999 was granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.
⁸ Access agreements update issued October 17, 1999 with request to extend deadline to October 1, 1999. Extensions to October 1, 1999 was granted by Mike McAteer in a October 21, 1999 e-mail to Mike Light

January 21, 1999 Sauget Area I AOC

<u>SCHEDULE (Cont.)</u> (11/99)

9. Sampling Notification
 10 Business Days Prior to Start of Work⁹
 10. Submit Data Report
 01/09/01¹⁰

11. Submit EE/CA Report 60 Calendar Days After Data Report Submittal - 03/09/01

12. Submit Revised EE/CA Report

21 Calendar Days After Receipt of EPA Comments

13. Submit RI/FS Report 90 Calendar Days After Data Report Submittal - **04/09/01**

14. Submit Revised RI/FS Report

21 Calendar Days After Receipt of EPA Comments

15. Progress Reports

Monthly Beginning February 19, 1999¹¹

⁹ Notification given on August 19, 1999 that Air Sampling will begin on October 7, 1999. Per 9-2-99 phone conversation with Mike McAteer, the 10 day notification requirement can be treated as a "Day 1" requirement only, which has already been met.

¹⁰ Per SSP - 16 mo. from SSP approval date of 9/9/99.

¹¹ Pursuant to decisions in 9-1-99 EPA Kickoff Meeting - Report period for the monthly report will be changed to the calendar month to coincide with project field work - due on the 10th of the month.